

Assigned to: Rothstein, Barbara J.

Assigned Date: 05/09/2013

Description: SUPERSEDING INDICTMENT

Case Related To: 08cr057 (BJR)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

B-19-739

Holding a Criminal Term

Grand Jury Sworn in on May 7, 2012

FILED IN OPEN COURT

MAY 09 2013

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

CRIMINAL NO. 08-057

**ANTONIO EZEQUIEL
CARDENAS-GUILLEN, (1)
a.k.a. "Tony Tormenta";**

VIOLATIONS:

**JORGE EDUARDO
COSTILLA-SANCHEZ, (2)
a.k.a. "El Cos," a.k.a. "Doble X,"
a.k.a. "Dos Equis";**

21 U.S.C. §§ 959, 960, 963
(Conspiracy to Manufacture and
Distribute Five Kilograms or
More of Cocaine and 1,000 Kilograms
or More of Marijuana for Importation
into the United States)

**HERIBERTO
LAZCANO-LAZCANO, (3)
a.k.a. "Lazca," a.k.a. "El Licenciado";**

21 U.S.C. §§ 959, 960, 963
(Attempted Distribution of Five Kilograms
or More of Cocaine for Importation into
the United States)

**MIGUEL TREVINO-MORALES, (4)
a.k.a. "40," a.k.a. "Zeta 40,"
a.k.a. "Cuarenta";**

18 U.S.C. § 2
(Aiding and Abetting)

**JAIME GONZALEZ-DURAN, (5)
a.k.a. "Hummer";**

21 U.S.C. § 853
21 U.S.C. § 970
(Forfeiture)

**SAMUEL FLORES-BORREGO, (6)
a.k.a. "Tres," a.k.a. "Metro Tres";**

**MARIO RAMIREZ-TREVINO, (7)
a.k.a. "Mario Pelon," a.k.a. "X-20";**

ALFREDO RANGEL-BUENDIA, (8)
a.k.a. "Chicles";

LINO ARISTEO
VAZQUEZ-CUEVAS, (9)
a.k.a. "Lino";

GILBERTO
BARRAGAN-BALDERAS, (10)
a.k.a. "Tocayo";

JUAN REYES
MEJIA-GONZALEZ, (11)
a.k.a. "R-1," a.k.a. "Kike,"
a.k.a. "Reyes";

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OMAR TREVINO-MORALES, (12)
a.k.a. "42";

ELEAZAR MEDINA-ROJAS, (15)
a.k.a. "El Chelelo";

CARLOS CERDA-GONZALEZ, (17)
a.k.a. "Puma," a.k.a. "Carlitos";

VICTOR HUGO LOPEZ-VALDEZ, (18)
a.k.a. "Jorge Hernandez-Martinez,"
a.k.a. "Chiri," a.k.a. "Chiriquas";

SIGIFREDO
NAJERA-TALAMANTES, (19)
a.k.a. "Canicon," a.k.a. "Chito,"
a.k.a. "Chito Can,"
a.k.a. "Chito Canico,"
a.k.a. "Chito Canicon";

DANIEL PEREZ-ROJAS, (20)
a.k.a. "Cachetes," a.k.a. "Cacheton";

CARLOS OLIVA-CASTILLO, (21)
a.k.a. "La Rana";

GABRIEL
MARTINEZ-BALLESTEROS, (22)
a.k.a. "Lima," a.k.a. "Lic,"
a.k.a. "Licenciado Ballesteros,"
a.k.a. "Gaby";

SALVADOR
MORALES-CHAVIRA, (23)
a.k.a. "Chava," a.k.a. "88";

JOSUE MARTINEZ-MONSIVAIS, (24)
a.k.a. "Negro Josue";

EDIEL LOPEZ-FALCON, (25)
a.k.a. "La Muela";

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RAUL RIVERA-NAVARRO, (26)
a.k.a. "Caco," a.k.a. "Trompas,"

Defendants.

FOURTH SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT I

**CONSPIRACY TO MANUFACTURE AND DISTRIBUTE
COCAINE AND MARIJUANA FOR IMPORTATION
INTO THE UNITED STATES**

Beginning sometime in or about 2000 and continuing thereafter up to on or about February 2010, the exact dates being unknown to the Grand Jury, in the countries of Mexico, Colombia, Guatemala, Panama, and elsewhere, defendants, **ANTONIO EZEQUIEL CARDENAS-GUILLEN**, a.k.a. "Tony Tormenta"; **JORGE EDUARDO COSTILLA-SANCHEZ**, a.k.a. "El Cos," a.k.a. "Doble X," a.k.a. "Dos Equis"; **HERIBERTO LAZCANO-LAZCANO**, a.k.a. "Lazca," a.k.a. "El Licenciado"; **MIGUEL TREVINO-MORALES**, a.k.a. "40," a.k.a. "Zeta 40," a.k.a. "Cuarenta"; **JAIME GONZALEZ-DURAN**, a.k.a. "Hummer"; **SAMUEL FLORES-BORREGO**, a.k.a. "Tres," a.k.a. "Metro Tres"; **MARIO RAMIREZ-**

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TREVINO, a.k.a. "Mario Pelon," a.k.a. "X-20"; **ALFREDO RANGEL-BUENDIA**, a.k.a. "Chicles"; **LINO ARISTEO VAZQUEZ-CUEVAS**, a.k.a. "Lino"; **GILBERTO BARRAGAN-BALDERAS**, a.k.a. "Tocayo"; **JUAN REYES MEJIA-GONZALEZ**, a.k.a. "R-1," a.k.a. "Kike," a.k.a. "Reyes"; **OMAR TREVINO-MORALES**, a.k.a. "42"; **ELEAZAR MEDINA-ROJAS**, a.k.a. "El Chelelo"; **CARLOS CERDA-GONZALEZ**, a.k.a. "Puma," a.k.a. "Carlitos"; **VICTOR HUGO LOPEZ-VALDEZ**, a.k.a. "Jorge Hernandez-Martinez," a.k.a. "Chiri," a.k.a. "Chiriquas"; **SIGIFREDO NAJERA-TALAMANTES**, a.k.a. "Canicon," a.k.a. "Chito," a.k.a. "Chito Can," a.k.a. "Chito Canico," a.k.a. "Chito Canicon"; **DANIEL PEREZ-ROJAS**, a.k.a. "Cachetes," a.k.a. "Cacheton"; **CARLOS OLIVA-CASTILLO**, a.k.a. "La Rana"; **GABRIEL MARTINEZ-BALLESTEROS**, a.k.a. "Lima," a.k.a. "Lic," a.k.a. "Licenciado Ballesteros," a.k.a. "Gaby"; **SALVADOR MORALES-CHAVIRA**, a.k.a. "Chava," a.k.a. "88"; **JOSUE MARTINEZ-MONSIVAIS**, a.k.a. "Negro Josue"; **EDIEL LOPEZ-FALCON**, a.k.a. "La Muela"; **RAUL RIVERA-NAVARRO**, a.k.a. "Caco," a.k.a. "Trompas," and others known and unknown to the Grand Jury and not indicted herein, did knowingly, intentionally, and wilfully combine, conspire, confederate, and agree to commit the following offense against the United States of America: (1) to knowingly and intentionally manufacture and distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, knowing and intending that such substance would be unlawfully imported into the United States from Mexico, and (2) to knowingly and intentionally manufacture and distribute 1,000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, knowing and intending that such substance would be unlawfully imported into the United States from Mexico,

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in violation of Title 21, United States Code, Sections 959 and 960; all in violation of Title 21, United States Code, Section 963.

COUNT TWO
ATTEMPTED DISTRIBUTION OF COCAINE
FOR IMPORTATION INTO THE UNITED STATES

On or about October 5, 2007, in Mexico, the defendants, **ANTONIO EZEQUIEL CARDENAS-GUILLEN**, a.k.a. "Tony Tormenta"; **JORGE EDUARDO COSTILLA-SANCHEZ**, a.k.a. "El Cos," a.k.a. "Doble X," a.k.a. "Dos Equis"; **HERIBERTO LAZCANO-LAZCANO**, a.k.a. "Lazca," a.k.a. "El Licenciado"; **MIGUEL TREVINO-MORALES**, a.k.a. "40," a.k.a. "Zeta 40," a.k.a. "Cuarenta"; **SAMUEL FLORES-BORREGO**, a.k.a. "Tres," a.k.a. "Metro Tres"; **MARIO RAMIREZ-TREVINO**, a.k.a. "Mario Pelon," a.k.a. "X20"; **ALFREDO RANGEL-BUENDIA**, a.k.a. "Chicles"; **LINO ARISTEO VAZQUEZ-CUEVAS**, a.k.a. "Lino"; **JUAN REYES MEJIA-GONZALEZ**, a.k.a. "R-1," a.k.a. "Kike," a.k.a. "Reyes"; and **CARLOS CERDA-GONZALEZ**, a.k.a. "Puma," a.k.a. "Carlitos," and others known and unknown to the Grand Jury and not indicted herein, did knowingly, intentionally, and wilfully attempt to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such cocaine would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959, 960 and 963, and Title 18, United States Code, Section 2.

COUNT THREE
ATTEMPTED DISTRIBUTION OF COCAINE
FOR IMPORTATION INTO THE UNITED STATES

On or about November 30, 2007, in Panama and in Mexico, the defendants, **JORGE EDUARDO COSTILLA-SANCHEZ**, a.k.a. "El Cos," a.k.a. "Doble X," a.k.a. "Dos Equis"; **SAMUEL FLORES-BORREGO**, a.k.a. "Tres," a.k.a. "Metro"; **MARIO RAMIREZ-**

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TREVINO, a.k.a. "Mario Pelon," a.k.a. "X-20"; and **GILBERTO BARRAGAN-BALDERAS**, a.k.a. "Tocayo," and others known and unknown to the Grand Jury and not indicted herein, did knowingly, intentionally, and wilfully attempt to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such cocaine would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959, 960 and 963, and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The violations alleged in Count One, Count Two and Count Three are re-alleged and incorporated by reference herein. As a result of the offenses alleged in Count One, Count Two and Count Three, the defendants, **ANTONIO EZEQUIEL CARDENAS-GUILLEN**, a.k.a. "Tony Tormenta"; **JORGE EDUARDO COSTILLA-SANCHEZ**, a.k.a. "El Cos," a.k.a. "Doble X," a.k.a. "Dos Equis"; **HERIBERTO LAZCANO-LAZCANO**, a.k.a. "Lazca," a.k.a. "El Licenciado"; **MIGUEL TREVINO-MORALES**, a.k.a. "40," a.k.a. "Zeta 40," a.k.a. "Cuarenta"; **JAIME GONZALEZ-DURAN**, a.k.a. "Hummer"; **SAMUEL FLORES-BORREGO**, a.k.a. "Tres," a.k.a. "Metro Tres"; **MARIO RAMIREZ-TREVINO**, a.k.a. "Mario Pelon," a.k.a. "X-20"; **ALFREDO RANGEL-BUENDIA**, a.k.a. "Chicles"; **LINO ARISTEO VAZQUEZ-CUEVAS**, a.k.a. "Lino"; **GILBERTO BARRAGAN-BALDERAS**, a.k.a. "Tocayo"; **JUAN REYES MEJIA-GONZALEZ**, a.k.a. "R-1," a.k.a. "Kike," a.k.a. "Reyes"; **OMAR TREVINO-MORALES**, a.k.a. "42"; **ELEAZAR MEDINA-ROJAS**, a.k.a. "El Chelelo"; **CARLOS CERDA-GONZALEZ**, a.k.a. "Puma," a.k.a. "Carlitos"; **VICTOR HUGO LOPEZ-VALDEZ**, a.k.a. "Jorge Hernandez-Martinez," a.k.a. "Chiri," a.k.a. "Chiriquas"; **SIGIFREDO NAJERA-TALAMANTES**, a.k.a. "Canicon," a.k.a. "Chito," a.k.a. "Chito Can,"

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a.k.a. "Chito Canico," a.k.a. "Chito Canicon"; **DANIEL PEREZ-ROJAS**, a.k.a. "Cachetes," a.k.a. "Cacheton"; **CARLOS OLIVA-CASTILLO**, a.k.a. "La Rana"; **GABRIEL MARTINEZ-BALLESTEROS**, a.k.a. "Lima," a.k.a. "Lic," a.k.a. "Licenciado Ballesteros," a.k.a. "Gaby"; **SALVADOR MORALES-CHAVIRA**, a.k.a. "Chava," a.k.a. "88"; **JOSUE MARTINEZ-MONSIVAIS**, a.k.a. "Negro Josue"; **EDIEL LOPEZ-FALCON**, a.k.a. "La Muela"; **RAUL RIVERA-NAVARRO**, a.k.a. "Caco," a.k.a. "Trompas," shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all respective right, title, or interest which such defendants may have in (1) any and all money and/or property constituting, or derived from any proceeds which such defendants obtained, directly or indirectly, as the result of the violations alleged in Count One, Count Two and Count Three of this Indictment and (2) any and all property used, in any manner or part, to commit, or to facilitate the commission of the violations alleged in Count One, Count Two and Count Three.

If any of said forfeitable property, as a result of any act or omission of the defendants, (a) cannot be located upon the exercise of due diligence, (b) has been transferred or sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property which cannot be subdivided without difficulty, it is the intention of the United States, pursuant to Title

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21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of said property pursuant to Title 21, United States Code, Sections 853 and 970.

A True Bill.

Foreperson


Arthur G. Wyatt

Chief

Narcotic and Dangerous Drug Section

Criminal Division

U.S. Department of Justice

Washington, D.C. 20530

By: 

Sean Torriente

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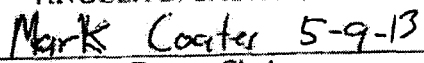
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U.S. District and Bankruptcy Courts
for the District of Columbia

A TRUE COPY

ANGELA D. CAESAR, Clerk

By  5-9-13
Deputy Clerk